

# **Exhibit 1**

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE INSTITUTE OF CETACEAN  
RESEARCH, a Japanese research  
foundation; KYODO SENPAKU  
KAISHA, LTD., a Japanese corporation;  
TOMOYUKI OGAWA, an individual; and  
TOSHIYUKI MIURA, an individual,

Plaintiffs,

v.

SEA SHEPHERD CONSERVATION  
SOCIETY, an Oregon nonprofit  
corporation, and PAUL WATSON, an  
individual,

Defendants.

SEA SHEPHERD CONSERVATION  
SOCIETY, an Oregon nonprofit  
corporation,

Counterplaintiff,

v.

THE INSTITUTE OF CETACEAN  
RESEARCH, a Japanese research  
foundation; KYODO SENPAKU  
KAISHA, LTD., a Japanese corporation;  
and HIROYUKI KOMURA, an individual,

Counterdefendants.

No. C11-2043 RAJ

PLAINTIFFS' NOTICE OF DEPOSITIONS

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26 and 30, plaintiffs will take the depositions of the persons described below at the law offices of Harris & Moure, PLLC, 600 Stewart Street, Suite 1200, Seattle, Washington 98101. Each deposition will follow completion of the preceding deposition.

<u>Person</u>	<u>Date</u>	<u>Time</u>
1. Marnie Gaede, president of Sea Shepherd Conservation Society	January 28, 2013	9:00 a.m.
2. Kurt Lieber, treasurer of Sea Shepherd Conservation Society	January 28, 2013	1:00 p.m.
3. Sea Shepherd Conservation Society's designee(s) with respect to matter Nos. 1 and 2 below	January 29, 2013	9:00 a.m.
4. Sea Shepherd Conservation Society's designee(s) with respect to matter No. 3 below	January 29, 2013	1:00 p.m.
5. Sea Shepherd Conservation Society's designee(s) with respect to matter No. 4 below	January 30, 2013	9:00 a.m.
6. Sea Shepherd Conservation Society's designee(s) with respect to matter No. 5 below	January 30, 2013	1:00 p.m.

Pursuant to Fed. R. Civ. P. 30(b)(6), Sea Shepherd Conservation Society shall designate one or more officers, directors, or managing agents or designate other persons who consent to testify on its behalf with respect to the following matters:

1. Defendants' "actual plans for the current season" as referenced in Defendants-Appellees' Motion for Reconsideration Regarding Injunction Pending Appeal (9th Cir. Dkt. No. 32-1) at 5.

2. All steps taken by defendants to ensure compliance with the Ninth Circuit's order issued December 17, 2012 (9th Cir. Dkt. No. 31) ("Order").

3. The relationship between or among defendants and Sea Shepherd Australia Limited, Stichting Sea Shepherd Conservation Society, and Sea Shepherd UK.

1                   4.       All funds, supplies, or property furnished by defendants to anyone to  
2       oppose plaintiffs' activities in the Southern Ocean in the current season (December 2012 through  
3       March 2013) or the source of said funds, supplies, or property.

4                   5.       Maintenance and posting of material on <http://www.seashepherd.org>.

5                   The oral examinations will be conducted before a court reporter and will be  
6       recorded by stenographic and videographic means. Plaintiffs will arrange for the court reporter's  
7       and videographer's attendance.

8                   The depositions will continue from day to day until adjourned or concluded. You  
9       are invited to attend and cross-examine.

10                  DATED this 9th day of January, 2013.

11  
12  
13                  By: 

John F. Neupert, P.C. #39883

MILLER NASH LLP

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*Attorneys for Plaintiffs and Counterdefendants*

*The Institute of Cetacean Research and*

*Kyodo Senpaku Kaisha, Ltd.*

I hereby certify that I served the foregoing Plaintiffs' Notice of Depositions on:

Daniel P. Harris  
dan@harrismoure.com  
Charles P. Moure  
charles@harrismoure.com  
Rachel E. Buker  
rachel@harrismoure.com  
HARRIS & MOURE, PLLC  
600 Stewart Street, Suite 1200  
Seattle, Washington 98101  
Telephone: (206) 224-5657  
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*Attorneys for Defendants and Counterplaintiff*

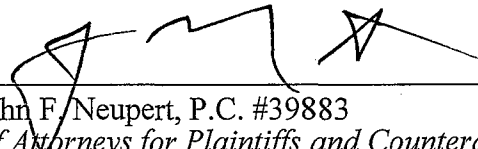
by the following indicated method or methods:

☒ First-class mail, postage prepaid.

☐ Hand-delivery.

☒ E-mail (as a courtesy only).

DATED this 9th day of January, 2013.

  
John F. Neupert, P.C. #39883  
*Of Attorneys for Plaintiffs and Counterdefendants  
The Institute of Cetacean Research and  
Kyodo Senpaku Kaisha, Ltd.*

CERTIFICATE OF SERVICE - 1  
(C11-2043 RAJ)

PDXDOCS:1988904.2

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